

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DANIEL JOYCE,
Individually and on behalf of a class of others
similarly situated,

Plaintiff,

v.

JOHN HANCOCK FINANCIAL SERVICES,
INC. SEVERANCE PAY PLAN and JOHN
HANCOCK FINANCIAL SERVICES, INC.,
as Administrator and Fiduciary of the John
Hancock Financial Services, Inc. Severance
Pay Plan

Defendants.

Civil Action No.05-11428 – WGY

**PLAINTIFF'S ASSENTED TO MOTION FOR LEAVE TO EXTEND THE TIME TO
OPPOSE DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Daniel Joyce, individually and on behalf of a class of others similarly situated ("Plaintiff" or "Joyce"), respectfully moves the Court for leave to extend the time to respond to Defendant's Motion for Summary Judgment by four days, until Tuesday, July 25, 2006. Defendants have assented to this Motion.

As grounds for his Motion, Plaintiff states that the additional time is necessary to finalize the documents to be submitted in opposition to Defendants' motion, as well as cross move for summary judgment. Plaintiff's counsel requests only four additional days beyond the fourteen days prescribed in Local Rule 7.1(B)(2) to fully respond to Defendants' Motion for Summary Judgment and Statement of Undisputed Facts in Support of Defendants' Motion for Summary Judgment. Counsel also requests that Defendants' time to file a reply brief be extended accordingly.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant his motion seeking to extend by four days the time to file an opposition and cross-motion for summary judgment, and extend accordingly Defendants' time to file a reply brief to Plaintiff's summary judgment opposition.

CERTIFICATE LOCAL RULE 7.1(A)(2)

The undersigned certifies that pursuant to Local Rule 7.1(A)(2) conference with Defendants' counsel for Defendants, who assented to this Motion.

Respectfully submitted,

DANIEL JOYCE, et al.

By his attorneys,

/s/ Kevin T. Peters
Kevin T. Peters (BBO#: 550522)
kpeters@toddweld.com
Seth J. Robbins (BBO#: 655146)
srobbins@toddweld.com
TODD & WELD LLP
28 State Street, 31st Floor
Boston, MA 02109
(617) 720-2626

Dated: July 20, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on July 20, 2006.

/s/ Kevin T. Peters
Kevin T. Peters

Date: July 20, 2006